

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	Chapter 11
Fred's, Inc., <i>et al.</i> , ¹	Case No. 19-11984 (CTG)
Debtors.	(Jointly Administered)
FI Liquidating Trust,	
Plaintiff,	
vs.	Adv. No. See Exhibit "A"
Defendants Listed on Exhibit "A",	
Defendant.	

**CERTIFICATE OF NO OBJECTION FOR PLAINTIFF'S MOTION FOR ORDERS
ESTABLISHING STREAMLINED PROCEDURES GOVERNING ADVERSARY
PROCEEDINGS BROUGHT BY PLAINTIFF PURSUANT TO SECTIONS 502, 547, 548,
549 AND 550 OF THE BANKRUPTCY CODE**

I, Ericka F. Johnson of Womble Bond Dickinson (US) LLP and N. Christopher Griffiths of Connolly Gallagher LLP, counsel to the FI Liquidation Trust of the above-captioned debtors (the "Trustee" or "Plaintiff"), hereby certify that as of the date hereof, I have received no answer, objection or other responsive pleading to *Plaintiff's Motion For Orders Establishing Streamlined Procedures Governing Adversary Proceedings Brought by Plaintiff Pursuant To Sections 502, 547, 548, 549 And 550 Of The Bankruptcy Code* (filed on September 28, 2021, at Docket No. 1569) (the "Motion").

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: Fred's, Inc. (4010); Fred's Stores of Tennessee, Inc. (9888); National Equipment Management and Leasing, Inc. (4296); National Pharmaceutical Network, Inc. (9687); Reeves-Sain Drug Store, Inc. (4510); Summit Properties-Jacksboro, LLC (9161); Summit Properties-Bridgeport, LLC (2200); and 505 N. Main Opp, LLC (5850). The Debtors' current mailing address is c/o FI Liquidating Trust, 27 Crimson King Drive, Bear, DE 19701.

The undersigned further certifies that I have caused the Court's docket in these cases to be reviewed and no answer, objection or other responsive pleading to the Motion appears thereon. Pursuant to the Notice of Motion, objections to the Motion were to be filed and served no later than October 12, 2021, at 4:00 p.m. (EDT).

It is hereby respectfully requested that the proposed Order as originally filed with the Motion be entered at its earliest convenience of the Court.

Dated: October 18, 2021

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